

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P.O. BOX 7566

WASHINGTON, D.C. 20044-7566

(202) 662-6000

TELEFAX: (202) 662-6291

TELEX: 89-593 (COVLING WSH)

CABLE: COVLING

WRITER'S DIRECT DIAL NUMBER

EX PARTE OR LATE FILED

DOCKET FILE COPY ORIGINAL

LECONFIELD HOUSE

CURZON STREET

LONDON W1Y 8AS

ENGLAND

TELEPHONE: 44-171-495-5655

TELEFAX: 44-171-495-3101

BRUSSELS CORRESPONDENT OFFICE

44 AVENUE DES ARTS

BRUSSELS 1040 BELGIUM

TELEPHONE: 32-2-512-9890

TELEFAX: 32-2-502-1598

(202) 662-5360

June 3, 1996

Mr. William Caton
Secretary
Federal Communications Commission
1919 M St., NW
Washington, D.C.

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OFFICE OF SECRETARY

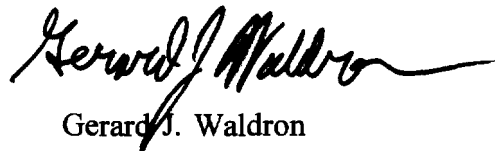
Re: Ex Parte Presentation in MM Docket No. 95-92

Dear Mr. Caton:

The Network Affiliated Stations Alliance ("NASA"), pursuant to Section 1.1206(a)(2) of the Commission's Rules, hereby notifies the Commission that representatives of NASA met with the staff of Chairman Hundt and with the staff of Commissioner Ness to discuss a number of issues pertaining to network-affiliate rules. The substance of the discussion is reflected in comments submitted in this proceeding and the enclosed hand-out.

Pursuant to section 1.1206 of the Commission's rules, this original and one copy have been submitted to the Secretary, and a copy supplied to each staff person present. If there are any questions on this matter, please contact the undersigned.

Sincerely,


Gerard J. Waldron

cc: Julius Genachowski, Esq.
David Siddall, Esq.

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NASA

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Affiliated
Stations
Alliance

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with the ABC, CBS and NBC Networks

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KLEW-TV, Lewiston, Idaho
KEPR-TV, Pasco, Washington
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Post-Newsweek Stations, Inc.
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WRDW-TV, Augusta, Georgia

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Montana Group Manager
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KTQV-TV, Billings, Montana
KRTV-TV, Great Falls, Montana
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KXLF-TV, Butte, Montana

The NBC Affiliates Association

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KFWU-TV, Ukiah, Ca.
KRCR-TV, Redding, Ca.
KLSR-TV, Eugene, Oregon
KFWU-TV, Eugene, Oregon

NETWORK-AFFILIATE RULES:

Necessary Safeguards That Enable Local Broadcasters to Serve Their Community

The Commission's network-affiliate rules promote the Communications Act goals of localism and diversity by structuring the network-affiliate relationship so that the public interest, the interest of the *local* community, is paramount. Repeal of this package of safeguards would disrupt that relationship, and local communities would suffer.

If these safeguards are repealed, then local communities would suffer the loss of local public affairs programming, religious specials, local and regional sports, charity telethons, and other unique programming designed to meet the needs of a community.

- The **Right To Reject** rule, 47 C.F.R. § 73.658(e), empowers 1600 local broadcasters to serve their communities by rejecting network programming that the licensee station reasonably believes to be contrary to the public interest and substituting programming which, in the station's opinion, is of greater local or national importance. If one cares about broadcast programming meeting the needs of a community, then this rule must be retained. And a local broadcaster that decides to preempt must not be forced to lose money to satisfy the needs of a community.
- The **Option Time** rule, 47 C.F.R. § 73.658(d), is necessary to ensure that a broadcaster which holds a license is discharging its responsibility to serve the community. This rule is the flip-side of the right to reject rule, and protects local broadcasters and the local community from networks overreaching.
- The **Exclusive Affiliation** rule, 47 C.F.R. § 73.658(a), promotes competition and has been useful to a number of start-up networks.

In addition to these three core rules, NASA also supports the network-rep rule, and the rule requiring filing of network contracts, which is a cost-effective measure that makes important information available to the public.